

EXHIBIT 18

From: Evan Hoey <EHoey@ktmc.com>
Sent: Wednesday, January 19, 2022 12:14 PM
To: Denton, Blake (NY); Berkowitz, Sean (CH); Tomkowiak, Sarah (DC); Trach, William (BN); Smith, Colleen (SD); Jin, Michael (NY); Miller, Julia (NY); Werner, Marc (NY); Rowen, Zachary (NY); Werner, Marc (NY); Yeu, Jooyoung (NY); Behrman, Megan (NY); Schlossberg, Suzanne (BN)
Cc: Gregory Castaldo; Sharan Nirmul; Richard Russo; Josh Materese; Michelle Newcomer; Austin Manning; Andrew M. Hankins; dberger@gelaw.com; kfisch@gelaw.com; cmoyna@gelaw.com; jpark@gelaw.com; RBerger@gelaw.com; cstein@gelaw.com
Subject: RE: Sjunde AP-Fonden, et al. v. General Electric Co., et al., No. 17-cv-8457 (JMF)

Blake,

As indicated below, we are repleading the January 20 statement that the Court previously dismissed. The factual basis of the amendment will be set forth in our forthcoming motion and proposed amended complaint. Separately, since we have not heard otherwise, we will proceed to file with redactions.

Regards,
Evan

From: Blake.Denton@lw.com [mailto:Blake.Denton@lw.com]
Sent: Tuesday, January 18, 2022 7:25 PM
To: Evan Hoey <EHoey@ktmc.com>; Sean.Berkowitz@lw.com; Sarah.Tomkowiak@lw.com; William.Trach@lw.com; Colleen.Smith@lw.com; Michael.Jin@lw.com; Julia.Miller@lw.com; Marc.Werner@lw.com; Zachary.Rowen@lw.com; Marc.Werner@lw.com; Jooyoung.Yeu@lw.com; Megan.Behrman@lw.com; Suzanne.Schlossberg@lw.com
Cc: Gregory Castaldo <gcastaldo@ktmc.com>; Sharan Nirmul <snirmul@ktmc.com>; Richard Russo <rrusso@ktmc.com>; Josh Materese <jmaterese@ktmc.com>; Michelle Newcomer <mnewcomer@ktmc.com>; Austin Manning <AManning@ktmc.com>; Andrew M. Hankins <ahankins@ktmc.com>; dberger@gelaw.com; kfisch@gelaw.com; cmoyna@gelaw.com; jpark@gelaw.com; RBerger@gelaw.com; cstein@gelaw.com
Subject: RE: Sjunde AP-Fonden, et al. v. General Electric Co., et al., No. 17-cv-8457 (JMF)

External E-Mail

Evan,

The below is the first mention we have heard of a motion to amend, so we are not sure which statement you are now seeking to add or why based on the documents/testimony to date. Can you please identify the factual basis for your request to amend?

We are reviewing the exhibits you provided and will respond separately on confidentiality designations.

Best regards,
Blake

From: Evan Hoey <EHoey@ktmc.com>
Sent: Monday, January 17, 2022 12:07 PM
To: Denton, Blake (NY) <Blake.Denton@lw.com>; Berkowitz, Sean (CH) <Sean.Berkowitz@lw.com>; Tomkowiak, Sarah (DC) <Sarah.Tomkowiak@lw.com>; Trach, William (BN) <William.Trach@lw.com>; Smith, Colleen (SD)

<Colleen.Smith@lw.com>; Jin, Michael (NY) <Michael.Jin@lw.com>; Miller, Julia (NY) <Julia.Miller@lw.com>; Werner, Marc (NY) <Marc.Werner@lw.com>; Rowen, Zachary (NY) <Zachary.Rowen@lw.com>; Werner, Marc (NY) <Marc.Werner@lw.com>; Yeu, Jooyoung (NY) <Jooyoung.Yeu@lw.com>; Behrman, Megan (NY) <Megan.Behrman@lw.com>
Cc: Gregory Castaldo <gcastaldo@ktmc.com>; Sharan Nirmul <snirmul@ktmc.com>; Richard Russo <rrusso@ktmc.com>; Josh Materese <jmaterese@ktmc.com>; Michelle Newcomer <mnewcomer@ktmc.com>; Austin Manning <AManning@ktmc.com>; Andrew M. Hankins <ahankins@ktmc.com>; dberger@gelaw.com; kfish@gelaw.com; cmoyna@gelaw.com; jpark@gelaw.com; RBerger@gelaw.com; 'Cecilia Stein' <cstein@gelaw.com>
Subject: Sjunde AP-Fonden, et al. v. General Electric Co., et al., No. 17-cv-8457 (JMF)

Counsel,

Plaintiffs intend to seek leave to file an amended complaint on Wednesday, January 19, 2022, to replead a January 20, 2017 statement by Jeff Bornstein that the Court previously dismissed. We intend to rely on information contained in the documents identified below to support the amendment. Please let us know by **noon ET** on Wednesday, January 19, 2022, if Defendants will withdraw the confidentiality designations ascribed to these documents. If not, we will file Plaintiffs' motion for leave to amend and proposed amended pleading consistent with Judge Furman's Individual Rule 7(C)(iii). In that case, please let us know if we may represent that the accompanying motion to redact is unopposed. Pursuant to Judge Furman's Individual Rule 7(C)(i), if Defendants choose not to withdraw these confidentiality designations they must file, within three days, a letter explaining the need to redact Plaintiffs' motion for leave to amend and the accompanying proposed amended pleading.

List of documents:

- Ex. 34
- Ex. 39
- Ex. 41
- Ex. 43
- Ex. 92
- Ex. 101
- Ex. 107
- Ex. 108
- Ex. 110
- Ex. 114
- Ex. 116
- Ex. 174
- Ex. 177
- Ex. 180
- Ex. 182
- Ex. 184
- Ex. 190
- Ex. 209
- Ex. 265
- Ex. 269
- Ex. 275
- Ex. 278
- Ex. 279
- Ex. 280
- Ex. 282
- Ex. 283
- GE_SDNY00043656
- GE_SDNY00043680

- GE_SDNY00082402
- GE_SDNY00374666
- GE_SDNY00550424
- GE_SDNY00634290
- GE_SDNY00666032
- GE_SDNY00666927
- GE_SDNY00730599
- GE_SDNY00979605
- Bolze Transcript at 225
- Calpeter Transcript at 142–43
- Delgadillo Transcript at 54
- Eshoo Transcript at 65–66
- Williamson Transcript at 44–45, 121–22
- Vitanza SEC Transcript at 127–34, 141–46, 154, 167–68

Regards,
Evan

Evan Hoey, Associate



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